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September 4, 2019

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Jane Doe, et al. v. The Trump Corporation, et al.*, 18-cv-09936 (LGS)

Dear Judge Schofield:

We write on behalf of Plaintiffs in the above-captioned action to provide the Court with additional information relevant to the parties' respective arguments about undue delay in Defendants' anticipated motion to compel arbitration. More specifically, Plaintiffs have located numerous recent cases in which Defendants (or an affiliate) have sought to compel arbitration (or moved to dismiss in favor of arbitration) at the beginning of the case. Although our research is ongoing, we expect there are many more such filings before 2014. These cases include:

- *Sims v. Trump*, No. 19-cv-00345 (D.C. Cir. 2019)
- *Cintron v. Trump Org. LLC*, No. 18-cv-6921 (S.D.N.Y. 2018)
- *Clifford v. Trump*, No. 18-cv-02217 (C.D. Cal. 2018)
- *Denson v. Trump*, No. 18-cv-2690 (S.D.N.Y. 2018)
- *Denson v. Trump*, No. 101617/2017 (Sup. Ct. N.Y. Cnty. 2017)
- *Hill v. Trump Old Post Office LLC*, No. 2017 CA 007615 B (D.C. Super Ct. 2017)
- *Murray v. Trump Entertainment Resorts*, No. 15-cv-6039 (E.D. Pa. 2015)*
- *Spicer v. Trump Entertainment Resorts*, No. 14-cv-3880 (E.D. Pa. 2015)*
- *Watson v. Trump Plaza Hotel & Casino*, No. 14-cv-1287 (E.D. Pa. 2014)*

* In these cases, Defendants filed notices of removal in relation to cases filed in state court and indicated on the removal forms that the case should be designated for arbitration.

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Copies of the relevant and available papers are appended.

Respectfully submitted,



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